



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey  
Special Prosecutions Division*

970 Broad Street, Suite 700  
Newark, New Jersey 07102

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December 18, 2018

Honorable Susan D. Wigenton  
United States District Judge  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *United States v. William E. Baroni, Jr. and Bridget Anne Kelly*  
Crim. No. 15-193 (SDW)

Dear Judge Wigenton:

This responds to defendants' joint letter of December 14, 2018. The Government consents to the defendants' request for the Court to enter an order vacating the control dates for their surrenders until re-sentencing and directing them to file a status update with the Court on or before January 11, 2019.

Respectfully submitted,

MARK E. COYNE  
Attorney for the United States\*

By: /s/Lee M. Cortes, Jr.  
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Vikas Khanna  
David W. Feder  
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cc: Carlos F. Ortiz, Esq.  
Michael Baldassare, Esq.  
Michael Critchley, Esq.

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\* Acting under authority conferred by 28 U.S.C. § 515.